

ESTTA Tracking number: **ESTTA679878**

Filing date: **06/24/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215100
Party	Plaintiff Emilio Pucci International BV
Correspondence Address	JULIA ANNE MATHESON FINNEGAN HENDERSON FARABOW GARRETT & DUNNER LLP 901 NEW YORK AVENUE NW WASHINGTON, DC 20001 UNITED STATES docketing@finnegan.com, julia.matheson@finnegan.com, TTAB-Legal-Assistants@finnegan.com
Submission	Other Motions/Papers
Filer's Name	Julia Anne Matheson
Filer's e-mail	docketing@finnegan.com, julia.matheson@finnegan.com, morgan.smith@finnegan.com, TTAB-Legal-Assistants@finnegan.com
Signature	/Julia Anne Matheson/
Date	06/24/2015
Attachments	6-24-15 JAM Dec in Support of Opposer's Opposition to Applicant's Motion for Protective Order.pdf(1564556 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

<p>EMILIO PUCCI INTERNATIONAL BV,</p> <p>Opposer,</p> <p>v.</p> <p>RANI SACHDEV,</p> <p>Applicant.</p>	<p>Opposition No.: 91215100</p> <p>Serial No.: 85913782</p> <p>Mark: ST. PUCCHI</p> <p>Filing Date: April 24, 2013</p>
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**DECLARATION OF JULIA ANNE MATHESON IN SUPPORT OF OPPOSER'S
OPPOSITION TO APPLICANT'S MOTION FOR PROTECTIVE ORDER**

I, Julia Anne Matheson, declare as follows:

1. I am a partner at Finnegan, Henderson, Farabow, Garrett & Dunner, LLP and am counsel of record for Emilio Pucci International BV ("Opposer") in this action. The facts set forth in this Declaration are based on my personal knowledge, or documents maintained in the ordinary course of business, unless otherwise noted.
2. Attached as Exhibit 1 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer at 1 PM on June 4, 2015 requesting a 30-day extension of time to respond to discovery.
3. Attached as Exhibit 2 is a true and correct copy of an e-mail I sent to Applicant's counsel Darren Rimer on June 4, 2015 explaining that I could not authorize an extension without Opposer's approval and that Opposer was unavailable.

4. Attached as Exhibit 3 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on June 4, 2015 requesting a 7-day extension of time to respond to discovery while the parties discussed settlement.

5. Attached as Exhibit 4 is a true and correct copy of an e-mail that I sent to Applicant's counsel Darren Rimer on June 4, 2015 explaining that I could not offer an extension of any length without Opposer's permission and that Opposer, who is located in France and Italy, was unavailable.

6. Attached as Exhibit 5 are true and correct copies of (1) an e-mail that I received from Applicant's counsel Darren Rimer on June 4, 2015 requesting an extension until June 8, 2015 while the parties discussed settlement and (2) and email that I sent Applicant's counsel Darren Rimer on June 4, 2015 explaining that I could not authorize an extension of any length.

7. Attached as Exhibit 6 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on June 4, 2015 stating that he would file a motion for protective order.

8. Attached as Exhibit 7 is a true and correct copy of an e-mail that I sent Applicant's counsel Darren Rimer on June 6, 2014 asking when I could expect to receive the materials reflecting Applicant's use of her mark.

9. Attached as Exhibit 8 is a true and correct copy of an e-mail that my paralegal Judy Valusek sent to Applicant's counsel Darren Rimer on June 13, 2014 asking when we could expect to receive the materials reflecting Applicant's use of her mark.

10. Attached as Exhibit 9 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on June 13, 2014 stating that he "got side tracked [sic]" and would send the materials the next week.

11. Attached as Exhibit 10 is a true and correct copy of an e-mail that my paralegal Judy Valusek sent to Applicant's counsel Darren Rimer on June 25, 2014 asking when we could expect to receive the materials reflecting Applicant's use of her mark.

12. Attached as Exhibit 11 is a true and correct copy of an e-mail that I sent Applicant's counsel on July 3, 2014 expressing Opposer's frustration with Applicant's delay and asking when I could expect to receive the materials reflecting Applicant's use of her mark.

13. Attached as Exhibit 12 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on August 4, 2014 requesting an extension of time for Applicant to file her answer and promising to send the materials "later this week."

14. Attached as Exhibit 13 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on August 21, 2014 promising to send the materials "early next week."

15. Attached as Exhibit 14 is a true and correct copy of an e-mail that I sent to Applicant's counsel Darren Rimer on September 12, 2014 detailing his pattern of delay and asking when I could expect to receive the materials reflecting Applicant's use of her mark.

16. Attached as Exhibit 15 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on September 17, 2014 promising to send the materials "by the end of the week."

17. Attached as Exhibit 16 is a true and correct copy of an e-mail that I received from Applicant's counsel Darren Rimer on March 20, 2015 indicating that he would have clarification from Applicant "tomorrow or Monday" and promising to "write further . . . early next week."

18. On April 3, 2014, I received a letter from Applicant's counsel Darren Rimer requesting Opposer's consent to a 30-day extension of time for Applicant to file its answer while the parties discussed settlement.

19. On May 16, 2014, Applicant's counsel Darren Rimer requested a 60-day extension of the existing case deadlines and promised to send me documents and press kits reflecting Applicant's use of her mark. That same day, I consented to a 60-day extension.

20. On or about October 29, 2014 I received documents from Applicant's counsel Darren Rimer reflecting Applicant's use of her mark.

21. On January 29, 2015 I sent a letter to Applicant's counsel Darren Rimer detailing Opposer's proposed settlement terms.

22. When Applicant's counsel did not respond to my January 29, 2015 letter, I sent him an email on March 9, 2015 asking when I could expect to hear from him. I also left him voice messages on March 11, 2015, and March 18, 2015.

23. On March 27, 2015, I sent Applicant's counsel Darren Rimer a letter indicating Opposer's unwillingness to tolerate any further delays in this proceeding.

24. On April 30, 2015 I sent a letter to Applicant's counsel Darren Rimer clarifying Opposer's settlement position and proposing settlement terms.

I declare under penalty of perjury that the foregoing is true and correct pursuant to 28 U.S.C. § 1746.

Date: June 24, 2015



Julia Anne Matheson

CERTIFICATE OF SERVICE

This will certify that a copy of the foregoing Declaration of Julia Anne Matheson in Support of Opposer's Opposition to Applicant's Motion for Protective Order has been served upon counsel for Applicant via first class mail, postage prepaid, on this 24th day of June 2015, at the following address of record:

DARREN S RIMER
RIMER & MATHEWSON LLP
30021 TOMAS, SUITE 300
RANCHO SANTA MARGARITA, CA 92688

_____

Exhibit 1

From: Darren S. Rimer <darren@rimermath.com>
Sent: Thursday, June 04, 2015 1:00 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; 'Darren S. Rimer'
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Julia,

I hope you have been well. I left you a message to give me a call.

I wanted to follow up with you about the status of our discussions.

I see that responses are due today for your discovery – are you okay with a 30 day extension of time while we continue to discuss settlement?

REDACTED - SETTLEMENT COMMUNICATION

Thanks, and I look forward to hearing from you soon.

Darren

Darren S. Rimer
Rimer & Mathewson LLP
30021 Tomas, Suite 300
Rancho Santa Margarita, CA 92688
(949) 367-1541 x 304
(949) 265-9010 (fax)
darren@rimermath.com
<http://www.rimermath.com>

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Exhibit 2

Valusek, Judy

From: Matheson, Julia Anne
Sent: Thursday, June 04, 2015 1:59 PM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Hi Darren,

I'm afraid that I do not have permission to give you an extension of the discovery deadline on this final day when responses are due. The client is long gone from the office and I would need to get their prior approval.

We are certainly interested in considering and negotiating settlement terms, but not in continued delay without progress.

Julia

Julia Anne Matheson

Partner

Finnegan, Henderson, Farabow, Garrett & Dunner, LLP

901 New York Avenue, NW, Washington, DC 20001-4413

+1 202 408 4020 | fax +1 202 408 4400 | julia.matheson@finnegan.com | www.finnegan.com

From: Darren S. Rimer [mailto:darren@rimermath.com]
Sent: Thursday, June 4, 2015 1:00 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; 'Darren S. Rimer'
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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Exhibit 3

From: Darren S. Rimer <darren@rimermath.com>
Sent: Thursday, June 04, 2015 2:16 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Julia,

REDACTED - SETTLEMENT COMMUNICATION

Can we agree on a 7 day extension while we try to iron out this issue?

Darren

Darren S. Rimer
Rimer & Mathewson LLP
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Rancho Santa Margarita, CA 92688
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From: Matheson, Julia Anne [<mailto:julia.matheson@finnegan.com>]
Sent: 06/04/2015 10:59 AM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Hi Darren,

I'm afraid that I do not have permission to give you an extension of the discovery deadline on this final day when responses are due. The client is long gone from the office and I would need to get their prior approval.

We are certainly interested in considering and negotiating settlement terms, but not in continued delay without progress.

Julia

Julia Anne Matheson

Partner

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901 New York Avenue, NW, Washington, DC 20001-4413

+1 202 408 4020 | fax +1 202 408 4400 | julia.matheson@finnegan.com | www.finnegan.com

FINNEGAN



From: Darren S. Rimer [<mailto:darren@rimermath.com>]

Sent: Thursday, June 4, 2015 1:00 PM

To: Matheson, Julia Anne

Cc: Valusek, Judy; 'Darren S. Rimer'

Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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Thanks, and I look forward to hearing from you soon.

Darren

Darren S. Rimer

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Rancho Santa Margarita, CA 92688

(949) 367-1541 x 304

(949) 265-9010 (fax)

darren@rimermath.com

<http://www.rimermath.com>

Exhibit 4

Valusek, Judy

From: Matheson, Julia Anne
Sent: Thursday, June 04, 2015 2:30 PM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Darren,

REDACTED - SETTLEMENT COMMUNICATION

I hope that is helpful clarification. Again, I apologize. But I am not at liberty to grant any extensions of any length without my client's permission. And as they are in France and Italy, they are long gone.

Julia

Julia Anne Matheson

Partner

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FINNEGAN



From: Darren S. Rimer [<mailto:darren@rimermath.com>]
Sent: Thursday, June 4, 2015 2:16 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Julia,

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From: Matheson, Julia Anne [<mailto:julia.matheson@finnegan.com>]
Sent: 06/04/2015 10:59 AM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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To: Matheson, Julia Anne

Cc: Valusek, Judy; 'Darren S. Rimer'

Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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Exhibit 5

From: Matheson, Julia Anne
Sent: Thursday, June 04, 2015 2:23 PM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Darren,

I'm really sorry. I do not have the client's authority to give an extension of any length at this point.

Julia

Julia Anne Matheson
Partner
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FINNEGAN



From: Darren S. Rimer [<mailto:darren@rimermath.com>]
Sent: Thursday, June 4, 2015 2:20 PM
To: Matheson, Julia Anne
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Julia,

What about an extension until Monday so we can discuss this issue?

Darren

Darren S. Rimer
Rimer & Mathewson LLP
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Rancho Santa Margarita, CA 92688
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From: Matheson, Julia Anne [<mailto:julia.matheson@finnegan.com>]
Sent: 06/04/2015 10:59 AM
To: Darren S. Rimer
Cc: Valusek, Judy; Smith, Morgan
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Exhibit 6

From: darren@rimermath.com
Sent: Thursday, June 04, 2015 5:07 PM
To: Matheson, Julia Anne
Subject: Re: RE: Your Client: Rani Sachdev - ST. PUCCHI

REDACTED - SETTLEMENT COMMUNICATION . Please provide your consent for a brief extension, until monday, so you can talk to your client. Otherwise, I will have to file a motion for a protective order. Thanks.

you can prepare a settlement agreement if you would like.

----- Original message-----

From: Matheson, Julia Anne
Date: Thu, 6/4/2015 11:30 AM
To: Darren S. Rimer;
Cc: Valusek, Judy; Smith, Morgan;
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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From: Darren S. Rimer [<mailto:darren@rimermath.com>]
Sent: Thursday, June 4, 2015 1:00 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; 'Darren S. Rimer'
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

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Exhibit 7

From: Matheson, Julia Anne
Sent: Friday, June 06, 2014 10:19 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Mersing, Jacob
Subject: FW: Trademark opposition - ST. PUCCHI

Darren:

You indicated you would provide "some documents and a press kit " and call to discuss your client's "historic use" of his mark to us several weeks ago, but we have not received anything from you. Please let us know when we can expect to receive materials.

Warmly,

Julia

Julia Anne Matheson, Esq.
Attorney at Law
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
901 New York Avenue, NW, Washington, DC 20001-4413
o202.408.4020 | fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

Exhibit 8

From: Valusek, Judy
Sent: Friday, June 13, 2014 9:41 AM
To: 'darren@rimermath.com'
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: Trademark opposition - ST. PUCCHI

Darren:

We are once again following up with you regarding your statement, nearly one month ago, that you would send us additional information. Please advise when we can expect to receive this additional information.

Judy Valusek
Trademark Trial and Appeal Board Paralegal
Assistant to Laurence R. Hefter, Whitney D. Cooke and Aliza A. George
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
901 New York Avenue, NW, Washington, DC 20001-4413
202-408-4190 | judy.valusek@finnegan.com | www.finnegan.com

FINNEGAN

-----Original Message-----

From: Matheson, Julia Anne
Sent: Friday, June 06, 2014 10:19 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Mersing, Jacob
Subject: FW: Trademark opposition - ST. PUCCHI

Darren:

You indicated you would provide "some documents and a press kit " and call to discuss your client's "historic use" of his mark to us several weeks ago, but we have not received anything from you. Please let us know when we can expect to receive materials.

Warmly,

Julia

Julia Anne Matheson, Esq.
Attorney at Law
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
901 New York Avenue, NW, Washington, DC 20001-4413
202.408.4020 | ☎fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

Exhibit 9

From: Darren S. Rimer <darren@rimermath.com>
Sent: Friday, June 13, 2014 1:26 PM
To: Valusek, Judy
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Thanks for your e-mail. My apologies. I was compiling these materials and got side tracked.

I will complete this and send this next week. We can pick up with our discussions after that.

Thank you, and have a good weekend.

Darren

Darren S. Rimer
Rimer & Mathewson LLP
30021 Tomas, Suite 300
Rancho Santa Margarita, CA 92688
(949) 367-1541 x 304
(949) 265-9010 (fax)
darren@rimermath.com
<http://www.rimermath.com>

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From: Valusek, Judy [mailto:Judy.Valusek@finnegan.com]
Sent: 06/13/2014 6:41 AM
To: darren@rimermath.com
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: Trademark opposition - ST. PUCCHI

Darren:

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Judy Valusek
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Assistant to Laurence R. Hetter, Whitney D. Cooke and Aliza A. George
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FINNEGAN

-----Original Message-----

From: Matheson, Julia Anne
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To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Mersing, Jacob
Subject: FW: Trademark opposition - ST. PUCCHI

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901 New York Avenue, NW, Washington, DC 20001-4413
fax: 202.408.4400 | 7202.408.4020 | julia.matheson@finnegan.com | www.finnegan.com

Exhibit 10

From: Valusek, Judy
Sent: Wednesday, June 25, 2014 11:12 AM
To: 'Darren S. Rimer'
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Darren:

Another two weeks have passed and we have not received anything from you. Please let us know when we can expect to receive the materials you promised.

Judy Valusek
Trademark Trial and Appeal Board Paralegal
Assistant to Laurence R. Hefter, Whitney D. Cooke and Aliza A. George
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FINNEGAN

From: Darren S. Rimer [mailto:darren@rimermath.com]
Sent: Friday, June 13, 2014 1:26 PM
To: Valusek, Judy
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

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I will complete this and send this next week. We can pick up with our discussions after that.

Thank you, and have a good weekend.

Darren

Darren S. Rimer
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(949) 265-9010 (fax)
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have received this message in error, please reply to this message to let us know, and then please delete this message from your system. Thank you.

From: Valusek, Judy [<mailto:Judy.Valusek@finnegan.com>]
Sent: 06/13/2014 6:41 AM
To: darren@rimermath.com
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: Trademark opposition - ST. PUCCHI

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FINNEGAN

-----Original Message-----

From: Matheson, Julia Anne
Sent: Friday, June 06, 2014 10:19 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Mersing, Jacob
Subject: FW: Trademark opposition - ST. PUCCHI

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fax: 202.408.4400 | 202.408.4020 | julia.matheson@finnegan.com | www.finnegan.com

Exhibit 11

From: Matheson, Julia Anne
Sent: Thursday, July 03, 2014 9:51 AM
To: Darren S. Rimer
Cc: Cooke, Whitney; Valusek, Judy; Reilly, Jenny
Subject: RE: Trademark opposition - ST. PUCCHI

Importance: High

Darren,

We are following up with you yet again for the promised materials regarding your client's business and use of the mark. Could you please explain the reason for the delay. Our client is understandably frustrated.

Please also explain the significance of the term "ST" in your client's mark.

We are hopeful we will receive your prompt response.

Julia

Julia Anne Matheson, Esq.
Attorney at Law
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901 New York Avenue, NW, Washington, DC 20001-4413
☎ 202.408.4020 | 📠 fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

FINNEGAN

From: Valusek, Judy
Sent: Wednesday, June 25, 2014 11:12 AM
To: Darren S. Rimer
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Darren:

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Judy Valusek
Trademark Trial and Appeal Board Paralegal
Assistant to Laurence R. Hefter, Whitney D. Cooke and Aliza A. George
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901 New York Avenue, NW, Washington, DC 20001-4413
202-408-4190 | judy.valusek@finnegan.com | www.finnegan.com

FINNEGAN

From: Darren S. Rimer [<mailto:darren@rimermath.com>]
Sent: Friday, June 13, 2014 1:26 PM

To: Valusek, Judy
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

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I will complete this and send this next week. We can pick up with our discussions after that.

Thank you, and have a good weekend.

Darren

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From: Valusek, Judy [<mailto:Judy.Valusek@finnegan.com>]
Sent: 06/13/2014 6:41 AM
To: darren@rimermath.com
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: Trademark opposition - ST. PUCCHI

Darren:

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Assistant to Laurence R. Hefter, Whitney D. Cooke and Aliza A. George
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901 New York Avenue, NW, Washington, DC 20001-4413
202-408-4190 | judy.valusek@finnegan.com | www.finnegan.com

FINNEGAN

-----Original Message-----
From: Matheson, Julia Anne
Sent: Friday, June 06, 2014 10:19 AM

To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Mersing, Jacob
Subject: FW: Trademark opposition - ST. PUCCHI

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Julia

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901 New York Avenue, NW, Washington, DC 20001-4413
fax: 202.408.4400 | 7202.408.4020 | julia.matheson@finnegan.com | www.finnegan.com

Exhibit 12

From: Matheson, Julia Anne
Sent: Monday, August 04, 2014 1:56 PM
To: Darren S. Rimer
Cc: Valusek, Judy; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Darren –

I'm afraid I'm not authorized to offer another extension of the Answer deadline. We will look forward to receiving the long promised materials and, if appropriate, can renew conversations at that time.

Best regards,

Julia

Julia Anne Matheson, Esq.
Attorney at Law
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☎ 202.408.4020 | 📠 fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

FINNEGAN

From: Darren S. Rimer [mailto:darren@rimermath.com]
Sent: Monday, August 04, 2014 1:24 PM
To: Matheson, Julia Anne
Subject: RE: Trademark opposition - ST. PUCCHI

Julia,

I see the answer is due today – are you okay with a further 30 or 60 day extension? I have had a more limited schedule due to my health. If you are okay with the extension, I can get this on file. If not, I understand, and I will get the answer on file.

Either way, I should have my care package out to you later this week.

Thanks, and I hope you have been well.

Darren

Darren S. Rimer
Rimer & Mathewson LLP
30021 Tomas, Suite 300
Rancho Santa Margarita, CA 92688
(949) 367-1541 x 304
(949) 265-9010 (fax)
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From: Matheson, Julia Anne [<mailto:julia.matheson@finnegan.com>]
Sent: 07/03/2014 6:51 AM
To: Darren S. Rimer
Cc: Cooke, Whitney; Valusek, Judy; Reilly, Jenny
Subject: RE: Trademark opposition - ST. PUCCHI
Importance: High

Darren,

We are following up with you yet again for the promised materials regarding your client's business and use of the mark. Could you please explain the reason for the delay. Our client is understandably frustrated.

Please also explain the significance of the term "ST" in your client's mark.

We are hopeful we will receive your prompt response.

Julia

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FINNEGAN

From: Valusek, Judy
Sent: Wednesday, June 25, 2014 11:12 AM
To: Darren S. Rimer
Cc: Matheson, Julia Anne; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Darren:

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Judy Valusek
Trademark Trial and Appeal Board Paralegal
Assistant to Laurence R. Hefter, Whitney D. Cooke and Aliza A. George
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901 New York Avenue, NW, Washington, DC 20001-4413
202-408-4190 | judy.valusek@finnegan.com | www.finnegan.com

Exhibit 13

From: Darren S. Rimer <darren@rimermath.com>
Sent: Thursday, August 21, 2014 3:31 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy; Cooke, Whitney; Bowling, Tracey; 'Darren S. Rimer'
Subject: RE: Discovery conference due 9-3-14 (ST. PUCCHI)

Julia,

I am out this week, and I did not get my materials to you prior to leaving the office. I will get these to you early next week. Let's shoot for the conference on the 2nd or 3rd. 11:00 am my time would be good either day.

Talk to you soon.

Darren

From: Matheson, Julia Anne [mailto:julia.matheson@finnegan.com]
Sent: 08/21/2014 7:55 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy; Cooke, Whitney; Bowling, Tracey
Subject: Discovery conference due 9-3-14 (ST. PUCCHI)

Darren,

Under the current trial calendar, we need to schedule a 26(f) conference in advance of the 9/3/14 deadline. Can you let me know your availability for same? And we are still looking forward to receiving the promised materials.

Julia

Julia Anne Matheson, Esq.
Attorney at Law
Finnegan, Henderson, Farabow, Garrett & Dunner, LLP
901 New York Avenue, NW, Washington, DC 20001-4413
☎ 202.408.4020 | ✉ fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

FINNEGAN

From: Matheson, Julia Anne
Sent: Monday, August 04, 2014 1:56 PM
To: Darren S. Rimer
Cc: Valusek, Judy; Cooke, Whitney
Subject: RE: Trademark opposition - ST. PUCCHI

Darren –

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Best regards,

Julia

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FINNEGAN

From: Darren S. Rimer [<mailto:darren@rimermath.com>]
Sent: Monday, August 04, 2014 1:24 PM
To: Matheson, Julia Anne
Subject: RE: Trademark opposition - ST. PUCCHI

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Either way, I should have my care package out to you later this week.

Thanks, and I hope you have been well.

Darren

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Exhibit 14

From: Matheson, Julia Anne
Sent: Friday, September 12, 2014 11:06 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy
Subject: ST. PUCCHI

Importance: High

Dear Darren,

I write to follow-up on the status of the materials you have promised repeatedly to send us on behalf of your client Rani Sachdev to facilitate a discussion regarding a possible amicable resolution to the opposition proceeding initiated by Emilio Pucci International B.V. against Sachdev's application to register ST. PUCCHI.

We thought a brief summary of our exchanges might offer a useful overview for you:

- On May 16, 2014, you represented via e-mail correspondence that you would obtain "some documents and a press kit so that we can discuss the historic use of this trademark..."
- On May 19, 2014, you again represented via e-mail correspondence that you "should have some materials to you next week..."
- On June 13, 2014 in response to a reminder from our office, you indicated that you were "compiling these materials and got side tracked." You represented that you would "complete this and send this next week."
- On July 3, 2014, we requested status on the promised materials and received no response.
- On August 4, 2014, you represented that you would "have my care package out to you later this week."
- On August 21, 2014, in response to yet another request for status on the promised materials, you responded that you were out of the office but that you would get the materials to us "early next week."
- Again on September 3, 2014, during our 26(f) conference, you indicated that the documents were scanned and copied and that you were putting a package together for our review.

Your 3+ month delay in providing these materials have caused unnecessary expenses for our client and create the impression that you are not dealing with us in good faith. Under the circumstances, I'm sure you can understand that Pucci is not willing to consider further extensions at this time given the total lack of progress between the parties.

Please convey to your client that although Pucci would prefer to resolve this matter amicably, it is prepared to prosecute this opposition through trial as necessary. Accordingly, we will shortly be serving initial disclosures and discovery in this matter.

Julia Anne Matheson, Esq.
Attorney at Law
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☎ 202.408.4020 | 📠 fax: 202.408.4400 | julia.matheson@finnegan.com | www.finnegan.com

FINNEGAN

Exhibit 15

From: Darren S. Rimer <darren@rimermath.com>
Sent: Wednesday, September 17, 2014 9:57 PM
To: Matheson, Julia Anne
Cc: Valusek, Judy
Subject: RE: ST. PUCCHI

Julia,

Thanks for your e-mail and my apologies that my health has made for a very limited schedule on my side. I will try to get this to you by the end of the week, and appreciate your patience. If you need to send discovery, I understand.

Talk to you soon.

Darren

From: Matheson, Julia Anne [<mailto:julia.matheson@finnegan.com>]
Sent: 09/12/2014 8:06 AM
To: Darren S. Rimer (darren@rimermath.com)
Cc: Valusek, Judy
Subject: ST. PUCCHI
Importance: High

Dear Darren,

I write to follow-up on the status of the materials you have promised repeatedly to send us on behalf of your client Rani Sachdev to facilitate a discussion regarding a possible amicable resolution to the opposition proceeding initiated by Emilio Pucci International B.V. against Sachdev's application to register ST. PUCCHI.

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FINNEGAN

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Exhibit 16

From: Darren S. Rimer <darren@rimermath.com>
Sent: Friday, March 20, 2015 2:52 AM
To: Matheson, Julia Anne
Cc: Valusek, Judy
Subject: RE: Your Client: Rani Sachdev - ST. PUCCHI

Julia and Judy,

My apologies for the delay in getting back to you. My schedule has been less than regular, and between my health and my mom's health, it has been a challenging time.

I am waiting on a point of clarification from Ms. Sachdev, and I should have this either tomorrow or Monday. I believe we should be able to resolve these issues amicably, and I will write further to you by early next week. Thanks for your patience, and I'll talk to you soon.

Darren

Darren S. Rimer
Rimer & Mathewson LLP
30021 Tomas, Suite 300
Rancho Santa Margarita, CA 92688
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(949) 265-9010 (fax)
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